

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL DEPOSIT INSURANCE
CORPORATION AS RECEIVER FOR
BROADWAY BANK,

Plaintiff,

v.

DEMETRIS GIANNOULIAS, GEORGE
GIANNOULIAS, JAMES MCMAHON,
SEAN CONLON, STEVEN DRY, DONNA
ZAGORSKI, STEVEN BALOURDOS,
GLORIA SGUROS and ANTHONY D'COSTA,

Defendants.

Case No. 12 Civ. 1665

Judge Robert M. Dow Jr.

Magistrate Judge Daniel Martin

JOINT MOTION FOR AMENDED PROTECTIVE ORDER

Plaintiff The Federal Deposit Insurance Corporation, as Receiver for Broadway Bank, and Defendants Demetris Giannoulias, George Giannoulias, James McMahon, Sean Conlon, Steven Dry, Donna Zagorski, Steven Balourdos, Gloria Sguros, and Anthony D'Costa (collectively, "the Parties"), by their attorneys, respectfully move the Court to enter the Amended Protective Order attached as Exhibit 1. In support of this Motion, the Parties state as follows.

1. Pursuant to FED. R. CIV. P. 26(c), the Parties have agreed that this case is likely to require the production of information that merits the entry of a protective order.
2. The Parties previously negotiated and agreed upon the entry of a Protective Order, which the Court entered upon motion on April 9, 2013. [Dkt 76.] Because the Parties seek to modify the scope of the April 9, 2013 Protective Order to include confidential business

information produced by third parties, the Parties jointly request that the Amended Protective Order attached as Exhibit 1 be entered by the Court.

FOR THESE REASONS, and all reasons of record, the Parties request that the Court enter the Amended Protective Order attached as Exhibit 1.

Dated: December 9, 2014

Respectfully submitted,

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| <p>By: <u>/s/ Susan G. Feibus</u></p> <p>F. Thomas Hecht fthecht@uhlaw.com</p> <p>Dean J. Polales djpolales@uhlaw.com</p> <p>Susan G. Feibus sgfeibus@uhlaw.com</p> <p>Richard H. Tilghman rtilghman@uhlaw.com</p> <p>UNGARETTI & HARRIS, LLP</p> <p>70 W. Madison St., Suite 3500</p> <p>Chicago, Illinois 60602</p> <p>Telephone: (312) 977-4400</p> <p><i>Counsel for Plaintiff</i></p> | <p>By: <u>/s/ Randall M. Lending</u></p> <p>Randall M. Lending relending@vedderprice.com</p> <p>Rachel T. Copenhaver rcopenhaver@vedderprice.com</p> <p>Vedder Price P.C.</p> <p>222 N. LaSalle St.</p> <p>Suite 2600</p> <p>Chicago, Illinois 60601-1003</p> <p>Telephone: (312) 609-7500</p> <p><i>Counsel for Defendants Sean Conlon, Steven Dry, Donna Zagorski, Steven Balourdos, Anthony D'Costa, and Gloria Sguros</i></p> |
| <p>By: <u>/s/ Robert J. Ambrose</u></p> <p>Robert J. Ambrose</p> <p>David C. Van</p> <p>Dyke Scott Frost</p> <p>Joseph W. Barber</p> <p>Howard and Howard PLLC</p> <p>200 S. Michigan Ave., Suite 1100</p> <p>Chicago, IL 60604</p> <p>Telephone: (312) 372-4000</p> <p><i>Counsel for Defendant James McMahon</i></p> | <p>By: <u>/s/ Eric Y. Choi</u></p> <p>Eric Y. Choi echoi@ngelaw.com</p> <p>NEAL, GERBER & EISENBERG LLP</p> <p>Two North LaSalle Street, Suite 1700</p> <p>Chicago Illinois 60602</p> <p>Telephone: (312) 827-1053</p> <p>Facsimile: (312) 980-0736</p> <p>-and-</p> <p>William L. Charron wcharron@pryorcashman.com</p> <p>Bryan T. Mohler bmohler@pryorcashman.com</p> <p>Pryor Cashman LLP</p> <p>7 Times Square</p> <p>New York, New York 10036</p> <p>Telephone: (212) 421-4100</p> <p><i>Counsel for Defendants Demetris Giannoulias and George Giannoulias</i></p> |

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Joint Motion for Amended Protective Order was served on all counsel of record via electronic case filing procedures on December 9, 2014.

s/ Eric Y. Choi
An Attorney for Defendants Demetris
Giannoulias and George Giannoulias